

SPOKANE MESSENGER &
PROCESS SERVICE
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Judge Patricia C. Williams

5 Attorneys for Defendant Corporation
6 Of The Catholic Archbishop Of Seattle

7 UNITED STATES BANKRUPTCY COURT
8 EASTERN DISTRICT OF WASHINGTON
AT SPOKANE

9 In re

10 THE CATHOLIC BISHOP OF
11 SPOKANE a/k/a/ the CATHOLIC
DIOCESE OF SPOKANE, A
12 Washington corporation sole,

13 Debtor.

Bankr. No: 04-08822-PCW11

Adv. Proc. No. 05-80004-PCW

14 JOHN DOE, JAMES DOE and JOSEPH
DOE (psudonyms),
15 Plaintiffs,
16 vs.
17 CATHOLIC ARCHBISHOP OF
18 SEATTLE, a Washington non profit
corporation, CATHOLIC BISHOP OF
19 SPOKANE, a Washington non profit
corporation; and PATRICK
20 O'DONNELL, individually,
21 Defendants.

SEATTLE ARCHDIOCESE'S
STATEMENT RE: SPOKANE
DIOCESE'S NOTICE OF
REMOVAL PURSUANT TO
28 U.S.C. 1451 AND F.R.B.P.
9027

FILED

FEB 11 2005

T.G. McGREGOR, CLERK
U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

{958475.DOC}
23 SEATTLE ARCHDIOCESE'S STATEMENT RE:
SPOKANE DIOCESE'S NOTICE OF REMOVAL
PURSUANT TO 28.U.S.C. 1451 AND F.R.B.P. 9027 - 1

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ORIGINAL

1 COMES NOW Defendant Corporation Of The Catholic Archbishop Of
2 Seattle (the "Seattle Archdiocese"), a non profit corporation sole, referred to in
3 the caption above as Catholic Archbishop Of Seattle, a Washington non profit
4 corporation, and makes the following statement concerning the allegations
5 contained in the Spokane Diocese's Notice Of Removal Pursuant To 28.U.S.C. §
6 1451 and F.R.B.P. 9027.

7 1. Admit.

8 2. Admit.

9 3. Admit.

10 4. Admit.

11 5. Admit.

12 6. Admit.

13 7. The bankruptcy proceeding is a core proceeding under 28 U.S.C. §

14 157 (b)(2)(A) and (B). As a core proceeding, the Seattle Archdiocese does not
15 consent to entry of final orders or judgment by the bankruptcy judge. Under 28
16 U.S.C. § 157(b)(5), plaintiffs' claims must be tried in the district court.

17 8. Admit.

18 The Seattle Archdiocese specifically reserves the right to raise the issue of
19 whether the bankruptcy court has jurisdiction to hear this matter.

20 A copy of this Statement Re: Spokane Diocese's Notice of Removal
21 Pursuant to 28.U.S.C. 1451 and F.R.B.P. 9027 has been served upon counsel of
22 record for all parties.

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23 SEATTLE ARCHDIOCESE'S STATEMENT RE:
24 SPOKANE DIOCESE'S NOTICE OF REMOVAL
PURSUANT TO 28.U.S.C. 1451 AND F.R.B.P. 9027 - 2

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1 DATED this 10th day of February, 2005.

2
3 LEE SMART COOK MARTIN &
4
5 PATTERSON, P.S., INC.

6 By: Michael A. Patterson
7 Michael A. Patterson, WSBA No. 7976
8 Karen A. Kalzer, WSBA No. 25429
9 Of Attorneys for Defendant Catholic
10 Archbishop Of Seattle

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12 SEATTLE ARCHDIOCESE'S STATEMENT RE:
13 SPOKANE DIOCESE'S NOTICE OF REMOVAL
14 PURSUANT TO 28.U.S.C. 1451 AND F.R.B.P. 9027 - 3

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